Stormwater Management Program

Prepared in accordance with
TPDES General Permit TXR040000

CITY OF COLLEGE STATION

2013

Contents

Definitions

Arid Areas - Areas with an average annual rainfall of less than ten (10) inches.

Best Management Practices (BMPs) - Schedules of activities, prohibitions of practices, maintenance procedures, structural controls, local ordinances, and other management practices to prevent or reduce the discharge of pollutants. BMPs also include treatment requirements, operating procedures, and practices to control runoff, spills or leaks, waste disposal, or drainage from raw material storage areas.

Clean Water Act (CWA) - The Federal Water Pollution Control Act or Federal Water Pollution Control Act Amendments of 1972, Pub.L. 92-500, as amended Pub. L. 95-217, Pub. L. 95-576, Pub. L. 96-483 and Pub. L. 97-117, 33 U.S.C. 1251 et. seq.

Common Plan of Development or Sale - A construction activity that is completed in separate stages, separate phases, or in combination with other construction activities. A common plan of development or sale is identified by the documentation for the construction project that identifies the scope of the project, and may include plats, blueprints, marketing plans, contracts, building permits, a public notice or hearing, zoning requests, or other similar documentation and activities.

Construction Activity - Soil disturbance, including clearing, grading, and excavating; and not including routine maintenance that is performed to maintain the original line and grade, hydraulic capacity, or original purpose of the site (e.g., the routine grading of existing dirt roads, asphalt overlays of existing roads, the routine clearing of existing right-of-ways, and similar maintenance activities). Regulated construction activity is defined in terms of small and large construction activity.

a) **Small Construction Activity** is construction activity that results in land disturbance of equal to or greater than one (1) acre and less than five (5) acres of land. Small construction activity also includes the disturbance of less than one (1) acre of total land area that is part of a larger common plan of development or sale if the larger common plan will ultimately disturb equal to or greater than one (1) and less than five (5) acres of land.

b) **Large Construction Activity** is construction activity that results in land disturbance of equal to or greater than five (5) acres of land. Large construction activity also includes the disturbance of less than five (5) acres of total land area that is part of a larger common plan of development or sale if the larger common plan will ultimately disturb equal to or greater than five (5) acres of land.

Construction Community – Local contractors, developers, engineers, and architects.

Construction Site Operator - The entity or entities associated with a small or large construction project that meet(s) either of the following two criteria:

a) The entity or entities that have operational control over construction plans and specifications (including approval of revisions) to the extent necessary to meet the requirements and conditions of this general permit; or

b) The entity or entities that have day-to-day operational control of those activities at a construction site that are necessary to ensure compliance with a stormwater pollution prevention plan for the site or other permit conditions (for example they are authorized to direct workers at a site to carry out activities required by the Stormwater Pollution Prevention Plan (SWPPP) or comply with other permit conditions).

Control Measure - Any BMP or other method used to prevent or reduce the discharge of pollutants to water in the state.

Conveyance - Curbs, gutters, man-made channels and ditches, drains, pipes, and other constructed features designed or used for flood control or to otherwise transport stormwater runoff.

Discharge –When used without a qualifier, refers to the discharge of stormwater runoff or certain non-stormwater discharges as allowed under the authorization of this general permit.

Final Stabilization - A construction site where either of the following conditions are met:

a) All soil disturbing activities at the site have been completed and a uniform (for example, evenly distributed, without large bare areas) perennial vegetative cover with a density of 70 percent of the native background vegetative cover for the area has been established on all unpaved areas and areas not covered by permanent structures, or equivalent permanent stabilization measures (such as the use of riprap, gabions, or geotextiles) have been employed.

b) For individual lots in a residential construction site by either:

   1. The homebuilder completing final stabilization as specified in condition (a) above; or
   2. The homebuilder establishing temporary stabilization for an individual lot prior to the time of transfer of the ownership of the home to the buyer and after informing the homeowner of the need for, and benefits of, final stabilization.

c) For construction activities on land used for agricultural purposes (for example pipelines across crop or range land), final stabilization may be accomplished by returning the disturbed land to its preconstruction agricultural use. Areas disturbed that were not previously used for agricultural activities, such as buffer strips immediately adjacent to a surface water and areas which are not being returned to their preconstruction agricultural use must meet the final stabilization conditions of condition (a) above.

d) In arid, semi-arid, and drought-stricken areas only, all soil disturbing activities at the site have been completed and both of the following criteria have been met:

   1. Temporary erosion control measures (e.g., degradable rolled erosion control product) are selected, designed, and installed along with an appropriate seed base to provide erosion control for at least three years without active maintenance by the operator, and
   2. The temporary erosion control measures are selected, designed, and installed to achieve 70 percent vegetative coverage within three years.

Illicit Connection - Any man-made conveyance connecting an illicit discharge directly to a municipal separate storm sewer.

Illicit Discharge - Any discharge to a municipal separate storm sewer that is not entirely composed of stormwater, except discharges pursuant to this general permit or a separate authorization and discharges resulting from emergency fire fighting activities.

Impaired Water - A surface water body that is identified on the latest approved CWA §303(d) List as not meeting applicable state water quality standards. Impaired waters include waters with approved or established total maximum daily loads (TMDLs) and those where a TMDL has been proposed by TCEQ but has not yet been approved or established.

Industrial Activity - Any of the ten (10) categories of industrial activities included in the definition of “stormwater discharges associated with industrial activity” as defined in 40 Code of Federal Regulations (CFR) §122.26(b)(14)(i)-(ix) and (xi).

MS4 Operator - For the purpose of this permit, the public entity or the entity contracted by the public entity, responsible for management and operation of the small municipal separate storm sewer system that is subject to the terms of this general permit.

Municipal Separate Storm Sewer System (MS4) - A conveyance or system of conveyances (including roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, man-made channels, or storm drains):

a) Owned or operated by the U.S., a state, city, town, borough, county, parish, district, association, or other public body (created by or pursuant to state law) having jurisdiction over the disposal of sewage, industrial wastes, stormwater, or other wastes, including special districts under state law such as a sewer district, flood control district or drainage district, or similar entity, or an Indian tribe or an authorized Indian tribal organization, or a designated and approved management agency under the CWA §208 that discharges to surface water in the state;

b) That is designed or used for collecting or conveying stormwater;

c) That is not a combined sewer; and

d) That is not part of a publicly owned treatment works (POTW) as defined in 40 CFR §122.2.

Outfall - A point source at the point where a small MS4 discharges to waters of the U.S. and does not include open conveyances connecting two municipal separate storm sewers, or pipes, tunnels, or other conveyances that connect segments of the same stream or other waters of the U.S. and are used to convey waters of the U.S.

Permittee - The MS4 operator authorized under this General Permit No TXR040000.

Point Source - (from 40 CFR § 122.22) any discernible, confined, and discrete conveyance, including but not limited to, any pipe, ditch, channel, tunnel, conduit, well, discrete fissure, container, rolling stock, concentrated animal feeding operation, landfill leachate collection system, vessel or other floating craft from which pollutants are or may be discharged. This term does not include return flows from irrigated agriculture or agricultural stormwater runoff.

Pollutant(s) of Concern – For the purpose of this permit, includes biochemical oxygen demand (BOD), sediment or a parameter that addresses sediment (such as total suspended solids (TSS), turbidity or siltation), pathogens, oil and grease, and any pollutant that has been identified as a cause of impairment of any water body that will receive a discharge from an MS4. (Definition from 40 CFR § 122.32(e)(3)).

Redevelopment - Alterations of a property that changed the ”footprint” of a site or building in such a way that there is a disturbance of equal to or greater than one (1) acre of land. This term does not include such activities as exterior remodeling, routine maintenance activities, and linear utility installation.

Semiarid Areas - Areas with an average annual rainfall of at least ten (10) inches, but less than 20 inches.

Small Municipal Separate Storm Sewer System (MS4) – A conveyance or system of conveyances (including roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, manmade channels, or storm drains):

a) Owned or operated by the U.S., a state, city, town, borough, county, district, association, or other public body (created by or pursuant to State law) having jurisdiction over disposal of sewage, industrial wastes, stormwater, or other wastes, including special districts under state law such as a sewer district, flood control district or drainage district, or similar entity, or an Indian tribe or an authorized Indian tribal organization, or a designated and approved management agency under CWA § 208;

b) Designed or used for collecting or conveying stormwater;

c) Which is not a combined sewer;

d) Which is not part of a publicly owned treatment works (POTW) as defined in 40 CFR § 122.2; and

e) Which was not previously regulated under a National Pollutant Discharge Elimination System (NPDES) or a Texas Pollutant Discharge Elimination System (TPDES) individual permit as a medium or large municipal separate storm sewer system, as defined in 40 CFR §§122.26(b)(4) and (b)(7).

This term includes systems similar to separate storm sewer systems at military bases, large hospitals or prison complexes, and highways and other thoroughfares. This term does not include separate storm sewers in very discrete areas, such as individual buildings. For the purpose of this permit, a very discrete system also includes storm drains associated with certain municipal offices and education facilities serving a nonresidential population, where those storm drains do not function as a system, and where the buildings are not physically interconnected to a small MS4 that is also operated by that public entity.

Stormwater and Stormwater Runoff - Rainfall runoff, snow melt runoff, and surface runoff and drainage.

Stormwater Associated with Construction Activity - Stormwater runoff from an area where there is either a large construction or a small construction activity.

Stormwater Management Program (SWMP) - A comprehensive program to manage the quality of discharges from the municipal separate storm sewer system.

Structural Control (or Practice) - A pollution prevention practice that requires the construction of a device, or the use of a device, to capture or prevent pollution in stormwater runoff. Structural controls and practices may include but are not limited to: wet ponds, bioretention, infiltration basins, stormwater wetlands, silt fences, earthen dikes, drainage swales, vegetative lined ditches, vegetative filter strips, sediment traps, check dams, subsurface drains, storm drain inlet protection, rock outlet protection, reinforced soil retaining systems, gabions, and temporary or permanent sediment basins.

Urbanized Area (UA) - An area of high population density that may include multiple small MS4s as defined and used by the U.S. Census Bureau in the 2000 and the 2010 Decennial census.

Waters of the United States - (According to 40 CFR § 122.2) Waters of the United States or waters of the U.S. means:

a) All waters which are currently used, were used in the past, or may be susceptible to use in interstate or foreign commerce, including all waters which are subject to the ebb and flow of the tide;

b) All interstate waters, including interstate wetlands;

c) All other waters such as intrastate lakes, rivers, streams (including intermittent streams), mudflats, sandflats, wetlands, sloughs, prairie potholes, wet meadows, playa lakes, or natural ponds that the use, degradation, or destruction of which would affect or could affect interstate or foreign commerce including any such waters:

    1. Which are or could be used by interstate or foreign travelers for recreational or other purposes;
    2. From which fish or shellfish are or could be taken and sold in interstate or foreign commerce; or
    3. Which are used or could be used for industrial purposes by industries in interstate commerce;

d) All impoundments of waters otherwise defined as waters of the United States under this definition;

e) Tributaries of waters identified in paragraphs (a) through (d) of this definition;

f) The territorial sea; and

g) Wetlands adjacent to waters (other than waters that are themselves wetlands) identified in paragraphs (a) through (f) of this definition.

Waste treatment systems, including treatment ponds or lagoons designed to meet the requirements of the CWA (other than cooling ponds as defined in 40 CFR § 423.11(m) which also meet the criteria of this definition) are not waters of the U.S. This exclusion applies only to manmade bodies of water which neither

were originally created in waters of the U.S. (such as disposal area in wetlands) nor resulted from the impoundment of waters of the U.S. Waters of the U.S. do not include prior converted cropland. Notwithstanding the determination of an area's status as prior converted cropland by any other federal agency, for the purposes of the CWA, the final authority regarding the CWA jurisdiction remains with the EPA.

Introduction

Regulatory Requirement

The 1972 amendments to the Federal Water Pollution Control Act, later referred to as the Clean water Act (CWA), prohibit the discharge of any pollutant to navigable waters of the U.S. from a point source unless the discharge is authorized by a National Pollutant Discharge Elimination System (NPDES) permit. The Clean Water Act establishes environmental programs, including the NPDES program, to protect the Nation's waters and directs the U.S. Environmental Protection Agency (EPA) to issue rules on how to implement this law. Under the NPDES program, a municipal stormwater plan was developed in two phases.

Phase I of the EPA municipal stormwater program was promulgated in 1990 under the authority of the Clean Water Act. Phase I relied on NPDES permit coverage to address stormwater runoff from medium and large municipal separate storm sewer systems (MS4s), serving populations of 100,000 and greater.

The Stormwater Phase II rule, promulgated December 8, 1999 to the Texas Commission on Environmental Quality (TCEQ), was the next step in the EPA's efforts to preserve, protect, and improve the nation's water resources from polluted stormwater runoff. TCEQ reissued the Texas Pollution Discharge Elimination System General Permit TXR040000 on December 13, 2013. The reissued permit categorizes MS4 operators by levels based on the population served within the 2010 Urbanized Area (UA). The City of College station is defined as a level 3 MS4. Level 3 operators serve a population between 40,000 and 100,000. The intent of the MS4 permit is to implement programs and practices to control polluted stormwater runoff. This program requires that the City of College Station:

- Reduce the discharge of pollutants to the maximum extent practicable (MEP);
- Protect water quality;
- Satisfy the appropriate water quality requirements of the Clean Water Act; and
- Manage stormwater quality activities through the Stormwater Management Program (SWMP).

Stormwater Management Program

The City of College Station has updated the SWMP in accordance with the requirements of the reissued TPDES General Permit TXR040000 for obtaining authorization for stormwater discharges and certain non-stormwater discharges. The SWMP has been developed to facilitate the City's efforts in reducing stormwater pollutants from the City's MS4 to the maximum extent practicable.

The City of College Station is required to develop a SWMP that describes specific actions that will be taken over a five-year period to reduce pollutants and protect the City's stormwater quality to the maximum extent practicable. The specific activities to be implemented are best management practices (BMPs). The SWMP must also set measurable goals and provide a schedule for the implementation of the BMPs. BMPs must be developed for each of the six minimum control measures (MCMs) that are required by the Phase II Rules.

The six MCMs are:

1. Public Education, Outreach, and Involvement;
2. Illicit Discharge Detection and Elimination;

3. Construction Site Stormwater Runoff Control;
4. Post-Construction Stormwater Management in New Development and Redevelopment;
5. Pollution Prevention and Good Housekeeping for Municipal Operations; and
6. Authorization for Construction Activities where the Small MS$ is the Site Operator (Optional).

Impaired Water Bodies and Total Maximum Daily Load (TMDL) Requirements

The Environmental Protection Agency recently listed three (3) stream segments within the Brazos Basin as impaired. These segments have been published on the Clean Water Act (CWA) Section 303(d)(1) list as having Escherichia Coli (E. coli). Entities within the watershed have worked to develop a Total Maximum Daily Load or TMDL for the pollutant. TMDL is the total amount of a substance that a water body can assimilate (take in) and still meet the Texas Surface Water Quality Standards. The Implementation Plan (I-Plan) identifies measurable goals and a schedule that seeks to meet the requirements of both Part III Section B of the TPDES Permit and the TMDL.

The City of College Station is subject to the requirements of the approved TMDL, and must include in its SWMP controls targeting the pollutant of concern along with any additional or modified controls required in Part II Section D of the MS4 permit (TVR040000). The SWMP and required annual reports must include information on implementing any focused controls required , described below:

Targeted Controls - The City of College Station's SWMP includes a detailed description of all targeted controls that identify areas of focused efforts or additional BMPs that will be implemented to reduce the pollutant of concern.

Measurable Goal – For each targeted control, the SWMP includes measurable goals and an implementation schedule describing BMPs to be implemented each year of the permit term.

Identification of Benchmark Goal – The SWMP identifies the Waste Load Allocation (WLA) as the benchmark goal per the TMDL.

Impairment for Bacteria – Since the pollutant of concern has been identified as bacteria, the city of College station elects to implement the BMPs outlined in the I-Plan.

Monitoring or Assessment of Progress – The permittee shall monitor or assess progress in achieving benchmark goals and determine the effectiveness of BMPs, and shall include documentation of this monitoring or assessment in the SWMP and annual reports. In addition, the SWMP must include methods to be used.

1) The permittee may use either of the following methods to evaluate progress toward the benchmark goal and improvements in water quality:

    a) Evaluating Program Implementation Measures – The permittee may evaluate and report progress towards the benchmark goal by describing activities and BMPs implemented, by identifying the appropriateness of the BMPs, and by evaluating the success of implementing the measurable goals. The permittee may assess progress by using program implementation indicators such as:
        i) Number of sources identified or eliminated;
        ii) Decrease in number of illegal dumping;
        iii) Increase in illegal dumping reports;
        iv) Number of educational opportunities conducted;
        v) Reductions in SSOs; or
        vi) Increase in illegal discharge detection through dry screening, etc.;

b) Assessing Improvements in Water Quality – The permittee may assess improvements in water quality by using available data segment and assessment units of water bodies from other reliable sources, or by purposing and justifying a different approach such as collecting additional in stream outfall monitoring data, etc. Data may be required from TCEQ, local river authorities, partnerships, and other local efforts as appropriate.

Progress towards achieving the benchmark goal shall be reported in the annual report. Annual reports shall report the benchmark goal and the year(s) during the permit term that the MS4 conducted additional sampling or other assessment.

Observing No Progress Towards the Benchmark Goal – If, by the end of the third year from the effective date of the permit, the permittee observes no progress toward the benchmark goal either from program implementation or water quality assessments, the permittee shall identify alternative focused BMPs that address new or increased efforts towards benchmark goals.

BMP 1. Coordinate and expand existing water quality monitoring in the watershed and conduct a watershed bacteria source survey.			
Measurable Goals	**Schedule**		**Monitoring/ Assessment of Progress**
Identify personnel to train and lead volunteers. Provide support in water quality monitoring via equipment cost, material cost, or personnel time. Develop and distribute volunteer material. Assist in data entry through DataViewer.	Year 1	Initiate water quality monitoring support. Submit PAR[1] to Texas Stream Team Coordinator.	1. Number of educational opportunities conducted. 2. PAR support contributions (Quarterly submissions to Texas Stream Team) 3. Report total PAR support in annual report.
	Year 2	Continue water quality monitoring support. Submit PAR to Texas Stream Team Coordinator.	
	Year 3 and Beyond	Continue water quality monitoring. Utilize project findings in directing future BMPs.	

BMP 2. Work to improve OSSF identification, inspection, pre-installation planning, education, operation, maintenance, and tracking of all OSSFs in the watershed to minimize the potential negative water quality impacts from malfunctioning systems.			
Measurable Goals	**Schedule**		**Monitoring/ Assessment of Progress**
Transfer GIS information as needed to BCHD for use in the OSSF identification efforts. OSSF identification and documentation will begin as funding and personnel time exists.	Year 1	Develop a standard operating procedure for collecting and disseminating GIS information to all entities[2]. Deliver E&O materials concerning OSSF maintenance.	1. Number of educational opportunities conducted (annually). 2. Report progress of OSSF identification in annual report.
	Year 2	Continue to deliver GIS information to all entities and E&O materials. Evaluate operating procedures and adjust to streamline transfer of information.	
	Year 3 and Beyond	Continue delivery of GIS information and E&O materials.	

BMP 3. Additional illicit discharge and dumping efforts to be implemented.			
Measurable Goals	**Schedule**		**Monitoring/ Assessment of Progress**
Currently, the SWMP addresses IDDE through dry weather screening and	Year 1	Develop educational materials for establishing a neighborhood storm drain screen watch program.	1. Number of published educational material on neighborhood storm drain screening program. 2. Record number of neighborhood screen watch activities.
	Year 2	Initiate storm drain screen watch program.	
	Year 3 and Beyond	Continue neighborhood storm drain screen watch.	

[1]PAR – Partner Activity Report identifies the type of support (e.g., material cost, supply cost, personnel time)
[2]Transfer of GIS information will be coordinated between the City of Bryan, City of College Station, and the Brazos County Health Department

BMP 4. Implement sanitary sewer overflow (SSO) initiative as appropriate across the watershed.			
Measurable Goals	**Schedule**		**Monitoring/ Assessment of Progress**
Meet the 2012 Wastewater Master Plan initiatives that are scheduled.	Year 1	Establish SSO initiative.	1. Number of educational opportunities conducted. 2. Number of SSOs identified and repaired. 3. Reduction in SSOs.
	Year 2	Implement SSO initiative (pending funding). Develop repair/ replacement priorities list according to the SSO initiative criteria. Document repairs and replacement of sewer system (annually).	
	Year 3 and Beyond	Continue or modify SSO initiative.	

BMP 5. Continue existing and work to establish new mechanisms that encourage and promote future development and redevelopment that will mitigate adverse water quality impacts in the watershed.			
Measurable Goals	**Schedule**		**Monitoring/ Assessment of Progress**
Implement and promote mechanisms such as existing ordinance amendments, new ordinance development, establish recognition programs for exceptional work in environmental stewardship, and continue to protect riparian areas (existing green spaces near creeks) from future development.	Year 1	Develop and assess a feasible local environmental awards/ recognition program.	1. Number of educational opportunities conducted. 2. Number of awards/recognitions granted annually.
	Year 2	If feasible, establish local environmental awards/recognition program.	
	Year 3 and Beyond	Continue local environmental awards/recognition program if feasible. Work to establish or develop ordinances to better protect instream water quality.	

MCM 1. Public Education, Outreach, and Involvement
Objective:

To develop, implement and maintain a comprehensive stormwater education and outreach program to educate public employees, businesses, and the general public of hazards associated with the illegal discharges and improper disposal of waste and about the impact that stormwater discharges can have on local waterways, as well as the steps that the public can take to reduce pollutants in stormwater. The City will also assess program elements that were described in the previous permit, modify as necessary, and develop and implement elements, as necessary, to continue reducing the discharge of pollutants from the MS4 to the maximum extent practicable (MEP).

1. Public Education, Outreach, and Involvement		**Frequency**
Public Education	Develop a list of topics to address in educational materials.	Annually
	Continue involvement in Brazos Clean Water.	
	Update the City stormwater website.	Quarterly
	Broadcast public service announcements.	
	Distribute utility bill inserts and newsletters on designated topics.	
Public Involvement	Continue providing volunteer support in the Adopt-a-Greenway program.	Annually
	Identify local groups that may be interested in Adopt-a-Greenway program.	
	Invite identified groups to join Adopt-a-Greenway program.	
	Identify local groups that may be interested in Adopt-a-Street program.	
	Invite identified groups to join Adopt-a-Street program.	
	Identify areas for storm drain stenciling.	
	Invite volunteers to participate in storm drain stenciling.	
	Establish a volunteer program for conducting stormwater quality monitoring or dry weather screening.	
	Identify areas that are safe for volunteers to conduct stormwater monitoring.	
	Develop a schedule for volunteer monitoring.	
	Invite groups to participate in volunteer monitoring program.	

MCM 2. Illicit Discharge Detection and Elimination
Objective:

Assess current illicit discharge detection and elimination program elements that were described in the previous permit, modify as necessary, and develop and implement new elements, as necessary, to continue reducing the discharge of pollutants from the MS4 to the maximum extent practicable (MEP).

2. Illicit Discharge Detection and Elimination		**Frequency**
MS4 Mapping	Maintain a map of the City's storm sewer system, surface waters, and high risk facilities.	Continuous
	Maintain a map of the City's sanitary sewer system with locations of sanitary sewer leaks and overflows.	
	Regularly update the City storm sewer map with new drainage structures and outfalls.	
Staff Training	Train staff to update MS4 maps.	Annually
	Train inspection and outfall screening personnel on the identification of septic system discharge locations and internal tracking and reporting mechanisms.	
	Train inspection and outfall screening personnel on the identification, tracking, and reporting of sanitary sewer leaks.	
	Train staff in the receiving of illicit discharge reports.	
Source Investigation and Elimination	Identify high risk facilities in the City.	Annually
	Conduct perimeter checks of high risk facilities to ensure there is no pollutant runoff.	Semi annually
	Regularly conduct dry weather screening in the identified areas.	Monthly
	Eliminate onsite sewage and gray water discharge that pose potential health and safety issues.	Continuous
	Use internal Work Order system to track reported discharge, investigate public reports, and corrective actions.	
	Conduct necessary sewer system maintenance and repairs.	
	Review internal procedures for tracing sanitary sewer leaks.	Annually
	Identify large above and below ground storage tanks within City limits.	
	Follow internal procedures for tracking, investigating, and reporting sanitary sewer overflows.	
	Create follow up procedures for illicit discharge investigations to ensure corrective actions have been taken.	
	Review and update master plan for projects designed to eliminate sanitary sewer overflows.	
Public Reporting of Illicit Discharge	Maintain a stormwater/illicit discharge hotline for public reporting.	Continuous
	Create internal procedures for receiving stormwater hotline calls.	
	Publish a list on allowed non-stormwater discharge that may be observed.	
	Investigate illicit discharge reports made by the public.	
Legal Authority	Review and update City ordinance prohibiting illicit discharge.	Annually

MCM 3. Construction Site Stormwater Runoff
Objective:

Develop, implement and enforce a program requiring operators of small and large construction activities to select, install, and maintain stormwater control measures that prevent illicit discharges to the MEP.

3. Construction Site Stormwater Runoff		**Frequency**
Legal Authority	Review and update ordinance to regulate construction activity.	Annually
Construction Plans Review	Review construction plans for compliance with stormwater regulations and necessary erosion controls.	
	Maintain a record of reviewed and approved construction site plans.	
	Report on the number of construction site plans reviewed annually.	
Construction Related Public Reporting	Develop educational material instructing the public on how to report construction site violations.	Continuous
	Develop internal procedures for tracking and responding to public complaints.	
	Investigate public complaints of construction sites.	
Construction Site Inspection and Compliance	Develop a schedule for construction site inspection.	Continuous
	Inspect construction sites according to schedule.	
	Inspect sites for illicit discharge and appropriate washout areas as part of site inspection.	
	Issue enforcement actions to sites not found to be in compliance.	
	Conduct follow up inspections to ensure corrective action is taken.	
	Maintain a record of inspection reports and enforcement actions from construction site stormwater inspections.	
	Maintain records of construction site compliance.	

MCM 4. Post-Construction Stormwater Management in New Development and Redevelopment
Objective:

Develop, implement and enforce a program, to the extent allowable under state and local law, to control stormwater discharges from new development and redeveloped sites that discharge into the small MS4 that disturb one acre or more, including projects that disturb less than one acre that are part of a larger common plan of development or sale. Use an ordinance or other regulatory mechanism to address post-construction runoff from new development and redevelopment standards.

4. Post-Construction Stormwater Management		**Frequency**
Legal Authority	Develop a list of post development stormwater quality issues that require City regulation, including structural and non-structural BMPs.	Annually
	Create and adopt guidelines to ensure long-term operation and maintenance of post-development structural and non-structural BMPs.	
	Issue enforcement actions to new development not in compliance with post-construction stormwater regulations.	As Needed
	Maintain a record of enforcement actions taken.	
	Review construction plans to determine compliance with post-construction runoff regulations.	Continuous
	Train staff on post-construction runoff regulations and final inspection procedures.	Annually
	Distribute post-construction design and permitting guidelines to the engineering community.	
	Keep a log of City-owned structural stormwater controls.	

MCM 5. Pollution Prevention and Good Housekeeping
Objective:

Develop and implement an operation and maintenance program, include an employee training component that has the ultimate goal of preventing or reducing pollutant runoff from activities and municipally owned areas including but not limited to parks and open space maintenance; street, road or highway maintenance; fleet and building maintenance; stormwater system maintenance; new construction and land disturbances; municipal parking lots; vehicles and equipment maintenance and storage yards; waste transfer stations; and salt/sand storage locations.

Assess program elements that have been described in the previous permit, modify as necessary, and develop and implement new elements, as necessary, to continue reducing the discharges of pollutants from the MS4 to the MEP.

5. Pollution Prevention and Good Housekeeping		**Frequency**
City Inventory	Maintain an inventory of City-owned industrial facilities.	Annually
	Maintain an inventory of City owned and operated parking areas.	
	Maintain an inventory of litter collection areas.	
	Maintain an inventory of areas designated for herbicide and pesticide application.	
	Maintain an inventory of City-owned landscaping areas.	
	Maintain an inventory of City-owned vehicles.	
	Maintain an inventory of City-owned facilities that require a Spill Prevention Control and Countermeasures Plan.	
	Maintain a map of City-owned facilities and permanent stormwater controls.	
Good Housekeeping	Determine industrial stormwater permit requirements for City-owned facilities.	Annually
	Train staff in good housekeeping and pollution prevention practices.	
	Identify pollutants that could be discharged from operations and maintenance activities.	
	Evaluate operations and maintenance procedures to minimize discharge of pollutants.	
	Apply herbicides and pesticides according to manufacturer recommendations and any applicable regulations.	Continuous
	Identify areas where catch basins, surface inlets, or storm drain manholes should be cleaned.	Annually
	Implement an inlet and storm drain cleaning program according to the developed inspection schedule.	
	Implement street sweeping according to existing schedule.	Existing schedule
	Implement sweeping of City-owned parking lots.	
	Assess current roadway activities to determine if alternate practices would benefit stormwater quality.	Annually
	Identify facilities that require Spill Prevention Control and Countermeasures (SPCC) plans.	
	Maintain SPCC plans in identified facilities.	
	Wash City vehicles in approved areas to prevent wash water entering the storm drains.	Continuous
	Conduct routine inspection on all vehicles according to manufacturer specifications, also inspecting vehicle for the presence of fluid leaks.	Continuous
	Regularly inspect problem areas and high risk facilities for pollutant discharge.	Semi annually